

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA**

| | | |
|------------------|---|----------------------|
| VENTURIST, INC., |) | |
| |) | |
| Plaintiff |) | |
| |) | Case No. 2:06cv00494 |
| v. |) | |
| |) | |
| PAT MAUNEY, |) | |
| |) | |
| Defendant. |) | |
| _____ |) | |

UNOPPOSED MOTION FOR AN EXTENSION TO SERVE INITIAL DISCLOSURES

COMES NOW, Defendant Pat Mauney and submits the following Unopposed Motion for an Extension to Serve Initial Disclosures. The grounds for the motion are as follows:

According to Federal Rules of Civil Procedure, Rule 26(a)(1), initial disclosures must be served within 14 days after the scheduling conference under Rule 26(f). Although the scheduling conference under Rule 26(f) has taken place in this matter, this case is not yet at issue, as there are three pending motions before the court: Defendant's Motion to Dismiss for Lack of Personal Jurisdiction, Defendant's Motion for Change of Venue, and Plaintiff's Motion for Remand. The parties hereby stipulate that until the Court rules upon these three motions, initial disclosures under Rule 26(a)(1) would be untimely. As such, the parties agree to extend the deadline upon which to serve the initial disclosures until 14 days after the Court enters its ruling on the three motions listed above.

Respectfully Submitted,

Dated: September 28, 2006

/S/ - Jennifer D. Barrera
Jennifer D. Barrera
Attorney for Defendant PAT MAUNEY
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| Defendant. |) | |
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CERTIFICATE OF SERVICE

I hereby certify that on September 28, 2006, I electronically filed the foregoing with the Clerk of the Court, using the CM/ECF system which will send notification of such filing to the following registered:

Emily C. Marks
BALL, BALL, MATTHEWS & NOVAK, P.A.
2000 Interstate Park Drive, Suite 204
P.O. Drawer 2148
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Julie Jordan
Martenson, Hasbrouck & Simon
3379 Peachtree Road, N.E., Ste. 400
Atlanta, GA 30326

This 28 day of September, 2006

/S/ - Jennifer D. Barrera
Jennifer D. Barrera